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 9
                            UNITED STATES DISTRICT COURT
                          NORTHERN DISTRICT OF CALIFORNIA
10
                                SAN FRANCISCO DIVISION
11
12
                                                  Case No.: 3:17-cy-00939 WHA
     WAYMO LLC,
13
                                                  DECLARATION OF MILES EHRLICH
                 Plaintiff.
                                                  IN SUPPORT OF PLAINTIFF
14
                                                  WAYMO'S ADMINISTRATIVE
           v.
                                                  MOTION TO FILE UNDER SEAL ITS
15
                                                  BRIEF AND SUPPORTING
    UBER TECHNOLOGIES, INC., et al.,
                                                  DOCUMENTS ON THE DILIGENCED
16
                                                  EMPLOYEES' WAIVER OF
                  Defendants.
                                                  ATTORNEY-CLIENT PRIVILEGE
17
                                                  FOR MATERIALS PROVIDED TO
                                                  STROZ FRIEDBERG (Dkt. Nos. 1743
18
                                                  and 1747)
19
20
    I, Miles Ehrlich, declare as follows:
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           1.
                 I am an attorney licensed to practice in the State of California and am admitted to
22
    practice before this Court. I am a partner at the law firm Ramsey & Ehrlich LLP, counsel for
23
    Non-Party Anthony Levandowski. I have personal knowledge of the matters set forth in this
24
    Declaration, and if called as a witness I would testify competently to those matters.
25
           2.
                 I make this declaration in support of Waymo's Administrative Motion to File
26
    Under Seal Its Brief And Supporting Documents On The Diligenced Employees' Waiver of
27
     Attorney-Client Privilege For Materials Provided to Stroz Friedberg (Dkt. Nos. 1743 and 1747)
28
    EHRLICH DECLARATION ISO WAYMO'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL
    Case No. 3:17-00939-WHA
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("The Administrative Motion"). The Administrative Motion seeks an order sealing the following documents based on Mr. Levandowski's designation of privilege and/or confidentiality:

| Document | Portion to Be Filed Under Seal | Designating Party |
|---|-----------------------------------|---------------------|
| Waymo's Brief on the Diligenced Employee's waiver of attorney-client privilege for materials provided to Stroz Friedberg ("Waymo's Brief" Dkt. 1747) | Highlighted Portions | Anthony Levandowski |
| Exhibit 1 to Waymo's Brief (Dkt. 1743) | Entire Document | Anthony Levandowski |
| Exhibit 2 to Waymo's Brief (Dkt. 1743) | Entire Document | Anthony Levandowski |
| Exhibit 3 to Waymo's Brief (Dkt. 1743) | Entire Document | Anthony Levandowski |
| Exhibit 6 to Waymo's Brief (Dkt. 1743) | Entire Document | Anthony Levandowski |

- 3. Mr. Levandowski does not assert that the highlighted portions of Waymo's Brief, or Exhibits 1, 2, and 3, to Waymo's brief merit sealing.
- 4. Mr. Levandowski seeks to maintain the confidentiality of Exhibit 6 because it contains sensitive and highly confidential information regarding the legal advice he has sought over an approximately ten-year period for both personal and business matters (some of which are wholly unrelated to this litigation). The information contained in Exhibit 6 includes attorneys' names, email addresses, and subject matter of the advice Mr. Levandowski sought from his attorneys; therefore, Mr. Levandowski asserts that Exhibit 6 merits sealing.

I declare under penalty of perjury under the laws of the State of California and the United

EHRLICH DECLARATION ISO WAYMO'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL Case No. 3:17-00939-WHA

Case 3:17-cv-00939-WHA Document 1831 Filed 09/26/17 Page 3 of 3

| 1 | States of America that the foregoing is true and correct, and that this declaration was executed in | | | |
|---------------------------------|---|--|--|--|
| 2 | Berke | Berkeley, California, on September 25, 2017. | | |
| 3 | | | | |
| 4 | Date: | September 26, 2017 | Respectfully submitted, | |
| 5 | | | / / M | |
| 6 | | | /s/ Miles Ehrlich Miles Ehrlich | |
| 7 | | | Ramsey & Ehrlich LLP | |
| 8 | | | Counsel for Non-Party Anthony Levandowski | |
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